Senior Leadership Team – minutes

12 August 2019

Details of attendees are provided at the end of the minutes.

1. Introductions and apologies

Apologies for absence were received from Emma Bate.

2. Matters arising from the previous meeting

Minutes

The minutes of the previous meeting were approved as an accurate record.

Actions and decisions

Chris Braithwaite provided updates on the outstanding actions since circulation of the agenda. He explained that a report on tech-savvy workforce development plans had been circulated by email for initial consideration. This report would be considered by SLT on 27 August.

3. Updates from Executive Team meetings

Issue

SLT noted the report providing updates from recent Executive Team meetings.

4. Transformation programmes and regulatory priorities

Knowledge Programme

Issue

SLT discussed the scope and objectives of the knowledge programme, particularly whether this should focus on developing information gathering techniques or changing behaviours and how knowledge is used. SLT also discussed whether work to further develop the ICO's suite of management information (MI) should continue to be included in the knowledge programme. The alternative options were to move this programme to the service excellence programme, or remove MI projects from the transformation programmes.

Decision

SLT agreed that:

- the knowledge programme should aim to change behaviours and how knowledge is used in the organisation, including embedding an operational learning culture.
- corporate MI projects needed to retain a clear point of corporate ownership and should be included within a transformation programme.
- MI projects should continue to be owned by the knowledge programme, but with acknowledgement of the close links to the KPI strand of the service excellence programme. Joint working between the programmes should be explored where appropriate. This may be reviewed as the two programmes progress.
- MI projects for which were limited to single departments or directorates (for example, finance or HR MI) should not be part of the wider programme. However, directorates and departments should ensure that these projects provided MI in a format which was accessible to and easily interpretable by the wider organisation.

Surveillance and Facial Recognition Technology

Issue

Andy White highlighted the potential escalation of work in this area in coming months because of the expanding use of biometrics technology.

SLT discussed whether this regulatory priority should be limited to only those issues where technology was used for purposeful surveillance activities, or whether it should continue to include practices where the use of technology enabled surveillance as a by-product.

Decision

SLT agreed that this regulatory priority should continue to include focus on practices where technology enabled surveillance as a by-product.

5. Co-ordination of work on personal data in healthcare

Issue

SLT discussed the current scope of work in relation to personal data in healthcare, and discussed how to coordinate this work. Paul Arnold explained that Executive Team (ET) had discussed this issue the previous week and was keen to ensure that there was clarity of ownership of the key relationships. ET had requested that this particular issue be resolved by the end of August 2019 if possible. SLT noted that there would need to

be significant buy-in across the organisation into this work to achieve the initial outcomes in the desired timescales.

Decision

SLT agreed that a TCG would be formed to coordinate work on personal data in healthcare. Jonathan Bamford will chair this group and contact SLT colleagues to identify members for the TCG. The TCG will aim to map the workstreams and owners by the end of August.

Actions

Jonathan Bamford to contact SLT colleagues to nominate representatives for the healthcare TCG. *(Due date: 16/8/19)*

Jonathan Bamford to report to ET and SLT on the healthcare TCG's initial mapping of workstreams and owners by the end of August. *(Due date: 31/8/19)*

6. Economic Crime Plan

Issue

SLT discussed proposals for coordinating work in relation the Economic Crime Plan, noting that the ICO also enforced under the relevant legislation. Amanda Williams highlighted that, for the ICO to take a more active role in this work beyond the current observer status, there would need to be commitment to respond to information requests in line with tight deadlines.

Decision

SLT agreed that the ICO should take full involvement in the working groups and work-stream activities, beyond the current observer status.

7. Management accounts

Issue

SLT discussed the management accounts, which indicated that DP fee income was slightly short of forecast to the end of Q1. Andrew Hubert explained that this was due to income being below forecast for the final two months of Q1, and this had continued in the first month of Q2. SLT noted that significant work was ongoing to grow the data protection fee register throughout 2019/20 and it would be beneficial for a further informal discussion by SLT to review progress with this work.

SLT discussed whether decisions needed to be taken at this stage in terms to reduce spend in line with the reduced income received to date.

Decision

SLT agreed that decisions did not need to be taken to reduce spending at this stage, as the current deviation from budget was currently small and recoverable. SLT agreed that this should be reviewed at the end of Q2.

Actions

Mike Fitzgerald to facilitate an informal SLT discussion on progress with plans to grow the DP fee register. *Due date: 27/8/19*

Andrew Hubert to ensure that SLT reviews whether there is a need to reduce spending in the second half of 2019/20, if appropriate in light of DP fee income receipts. *Due date: 21/10/19*

8. 2019/20 Internal Audit Plan – proposed changes

Issue

SLT discussed a report setting out proposed changes to the 2019/20 internal audit plan.

Decision

SLT supported the proposed changes to the 2019/20 internal audit plan set out in the report, for onward submission to ET and Audit Committee.

9. Risk register

Issue

SLT considered a report setting out proposed updates to the risk register, following a full review of all risks by risk owners.

Decision

SLT agreed the proposed changes to the risk register, with the exception of the proposed changes to R72 and R47.

Actions

Mike Fitzgerald, Louise Byers and Chris Braithwaite to further discuss the proposed changes to R72 and R47. *Due date: 9/9/19*

10. SLT work programme

SLT noted the work programme for future meetings.

11. Service alignment update

There were no updates required on service alignment. Paul Arnold reported that at the next meeting of the service alignment project board,

the board should review whether this still needed to be a standing item on SLT agendas.

12. Any other business

Issue

Executive Team had considered a proposal for the ICO to be involved in the Ada Lovelace Foundation's Citizens' Biometrics Council. This had been circulated to SLT members the previous week, to allow them to consider opportunities which may arise from this alongside other research projects.

Attendance

Members

Paul Arnold (Chair)	Deputy Chief Executive Officer (Executive Director – Corporate Strategy and Planning)
Jonathan Bamford	Director of Regulatory Strategy (Domestic)
Gill Bull	Director of FOI Complaints and Compliance
Louise Byers	Director of Corporate Affairs and Governance
Steve Eckersley	Director of Investigations and Intelligence
Mike Fitzgerald	Director of Digital, IT and Customer Services
Suzanne Gordon	Director of Public Advice and Data Protection Complaints Service
Andrew Hubert	Director of Resources
Ian Hulme	Director of Regulatory Assurance
James Moss	Director of Legal Services (Regulatory Enforcement)
Andrew White	Director of High Priority Investigations and Intelligence
Amanda Williams	Director of Regulatory Strategy (Parliament and Government Affairs)

Attendees

Tim Bowden	Acting Head of Corporate Communications

Secretariat

Chris Braithwaite	Senior Corporate Governance Manager